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20 Attorneys for Plaintiff
21 KUIANA TAYLOR

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24 UNITED STATES DISTRICT COURT
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26 NORTHERN DISTRICT OF CALIFORNIA

27 KUIANA TAYLOR,

28 Plaintiff,

vs.

CITY AND COUNTY OF SAN
29 FRANCISCO,

Defendant.

Case No. CV 14 3555 CRB

**STIPULATED MOTION FOR
ADMINISTRATIVE RELIEF; AND
[PROPOSED] ORDER ALLOWING PARTIES
TO FILE DISCOVERY LETTER REGARDING
PRODUCTION OF CITY DOCUMENTS AND
IDENTIFICATION OF CITY EMPLOYEES
RECEIVING PUBLIC ASSISTANCE**

Civ. Local Rules 7-11 and 7-12

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32 Plaintiff Kuiana Taylor and Defendant City and County of San Francisco (collectively, "the
33 parties") hereby move this Court for an order allowing the parties to file a letter brief setting forth the
34 parties' respective positions regarding the production of City documents and identification of City
35 employees in the City's Jobs Now program, the job program in which Plaintiff participated. In order
36 to qualify for the Jobs Now program, individuals must have received public assistance in the past. It is
37 Stipulated Motion for Admin. Relief
38 CASE NO. CV 14 3555 CRB

1 the City's position that information identifying employees who are receiving public assistance is
2 protected by California Welfare and Institutions Code section 10850 which makes the disclosure of
3 such information a misdemeanor under California law. It is Plaintiff's position that this information is
4 highly relevant and necessary for Plaintiff to litigate her discrimination and harassment claims against
5 the City because a number of these individuals were witnesses to Plaintiff's alleged harassment and/or
6 alleged similar claims of harassment against Plaintiff's supervisor.

7 The Parties hereby make this Stipulated Motion for Administrative Relief in order to timely
8 resolve this discovery dispute so that documents can be produced and an initial round of depositions
9 can occur before the Court ordered mediation, currently set for May 20, 2015, takes place. Waiting 35
10 days to resolve this dispute through formal motion procedures would needlessly delay the process and
11 possibly prevent the parties from adequately preparing for the mediation. Moreover, filing a single
12 letter outlining the parties respective positions will reduce the attorney time spent resolving this
13 dispute.

14 Dated: January 28, 2015

LEGAL AID SOCIETY

15 By: /s/Rachael Langston
16 RACHAEL LANGSTON

17 Attorney for Plaintiff
18 KUIANA TAYLOR

19 dated: January 28, 2015

20 DENNIS J. HERRERA
21 City Attorney
22 ELIZABETH SALVESON
23 Chief Labor Attorney
24 ERIK A. RAPOPORT
25 Deputy City Attorney

26 By: /s/Erik A. Rapoport
27 ERIK A. RAPOPORT
28 Attorney for Defendant

CITY AND COUNTY OF SAN FRANCISCO

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2 [Proposed] ORDER
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5 The Court has reviewed the Parties Stipulated Motion for Administrative Relief. Good cause
6 appearing, and PURSUANT TO STIPULATION, IT IS SO ORDERED – The Parties may file a single
7 letter outlining their respective positions regarding the City's production of documents and
8 identification of City employees receiving public assistance.

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10 Dated: February 3, 2015
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